

LAW OFFICES

ARTHUR J. SEMETIS, P.C.286 MADISON AVENUE
14th FLOOR
NEW YORK, NY 10017(212) 557-5055
Fax: (212) 557-5051

ARTHUR J. SEMETIS

OF COUNSEL:- MICHAEL J. McDERMOTT
- SHANNON P. GALLAGHER
- CONSTANTINE T. TZIFAS

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>6/25/08</u>
--

OF COUNSEL:

RIVELIS, PAWA & BLUM, LLP

June 25, 2008

VIA FACSIMILE (212) 805-7906Hon. Denny Chin
United States District Court
Southern District of New York
500 Pearl Street, Room 1020
New York, New York 10007**Re: Mason Tenders v. Big Apple Roofing & Construction Corp. et al.**
Case No.: Case No.: 07 Civ. 3499

Dear Judge Chin:

We represent the defendants in the above-referenced action. This letter is to request a sixty (60) day extension to the Court's discovery schedule and an adjournment of the pre-trial conference scheduled for June 27, 2008. This request is made with the consent of plaintiff's counsel and is made to afford the parties time to conduct depositions, if necessary. The parties have been communicating in an attempt to settle this matter and paper discovery is complete. There have been no prior requests for any extension of time.

Accordingly, we respectfully request that the Court grant a sixty (60) day extension of its discovery schedule and an adjournment of the pre-trial conference scheduled for June 27, 2008.

If the Court requires any additional information, the parties are available to conference with the Court.

Very truly yours,

Constantine T. Tzifas

cc: Michael Vollbrecht, Esq. (via facsimile)

Approved. The discovery cut-off (fact & expert) is extended until 9/12/08. The PTC is adjourned to 9/12/08 at noon.

SO ORDERED.
[Signature]
WPS

6/25/08